

### **REMARKS**

The present Amendment amends claims 1-4, 41 and 42 and leaves claims 6, 8, 10, 11, 13, 15, 17, 19-21, 24, 26, 28, 29, 31, 33, 35 and 37-39 unchanged.

Therefore, the present application has pending claims 1-4, 6, 8, 10, 11, 13, 15, 17, 19-21, 24, 26, 28, 29, 31, 33, 35, 37-39, 41 and 42.

Claims 1-4, 8, 11, 13, 17, 19, 20, 26, 29, 31, 35, 37, 38, 41 and 42 stand rejected under 35 USC §103(a) as being unpatentable over Mankoff (U.S. Patent No. 6,385,591) in view of Granger (U.S. Patent Publication 2002/007306); and

claims 6, 10, 15, 21, 24, 28, 33 and 39 stand rejected under 35 USC §103(a) as being unpatentable over Mankoff in view of Souissi (U.S. Patent No. 6,327,300)).

These rejections are traversed for the following reasons. Applicants submit that the features of the present invention as now recited in claims 1-4, 6, 8, 10, 11, 13, 15, 17, 19-21, 24, 26, 28, 29, 31, 33, 35, 37-39, 41 and 42 are not taught or suggested by Mankoff, Granger or Souissi whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw these rejections.

Amendments were made to the each of the independent claims to more clearly recite that the present invention as a result of permitting a user of the first portable terminal to initiate a coupon matching sequence in the first portable terminal that compares the stored coupon information with wireless transmissions of promotions in effect at a retail outlet when entered, and if a match occurs, granting discounts on goods and services or other benefits to the user, wirelessly transferring at least a part of the stored coupon information corresponding to the granted

discounts on goods and services resulting from the coupon matching sequence including the coupon ID number from the first portable terminal to another terminal for redemption during a transaction. These features are clearly not taught or suggested by Mankoff.

Mankoff simply teaches the use of a personal data assistant (PDA) 15 which can select the downloading of a virtual coupon either by being synchronized with the database of a client 10 which by use of a browser function downloads from a web page the virtual coupon or by being wirelessly connected to the internet by which a browser function downloads from the web page the virtual coupon. Thus, Mankoff is simply concerned with how to download virtual coupon onto a PDA 15. It should be noted that the specific teaching of Mankoff is to obtain the virtual coupon using a "pull" system rather than a "push" system as specifically recited in the claims. As is well known a "pull" system requires the intervention of a user to initiate the download of information.

It should be further noted that there is absolutely no teaching or suggestion in Mankoff of any steps related to or suggesting how the virtual coupon stored in the PDA is redeemed. Mankoff simply teaches that the virtual coupon is downloaded to the PDA by either a wireless link or by synchronization with the database of the client 10. There is no other teaching in Mankoff.

Thus, Mankoff does not teach or suggest that the coupon information is wirelessly pushed to the portable terminal so as not to require any action on the part of the portable terminal as in the present invention. Mankoff clearly teaches contrary

to the expressed limitations in the claims that steps must be taking by the user of the client or the PDA to download (pull) the virtual coupon to the PDA.

Further, there is no teaching or suggestion in Mankoff that the user in possession of the portable terminal can initiate a coupon matching sequence in the portable terminal when the terminal enters the retail outlet as recited in the claims. There is absolutely no teaching in Mankoff on what steps are taken by the user of the PDA when the user and the PDA enters a retail outlet as in the present invention. Mankoff is simply concerned with how to download a virtual coupon to the PDA. Redemption of the virtual coupon is not the concern of Mankoff.

Still further, there is no teaching or suggestion in Mankoff that the coupon matching sequence compares the coupon information stored in the portable terminal with wireless transmissions of promotions in effect at the retail outlet when the retail outlet is entered and if a match occurs then the user of the portable terminal is granted discounts on goods and services and other benefits as recited in the claims. Again, Mankoff is not concerned with the redemption of the virtual coupon and therefore need not perform a step of matching the coupon information stored in the terminal with wireless transmissions of promotions then in effect at the retail outlet when the retail outlet is entered by the user and the terminal as in the present invention.

Still further yet, Mankoff fails to teach or suggest wirelessly transmitting at least a part of the stored coupon information corresponding to granted discounts on goods and services resulting from the coupon matching sequence including the coupon ID number from the first portable terminal to another terminal for redemption

during a transaction as recited in the claims. As shown above, there is absolutely no teaching or suggestion in Mankoff regarding the steps required to be taken so as to redeem the virtual coupon. According to the present invention, specific features are recited in each of the claims regarding the redemption of the coupon information. As per the present invention, first the coupon information stored in the terminal is compared with promotions then in effect when the user and the terminal enters the retail outlet. If a match occurs according to the present invention a discount is granted in correspondence to particular coupon information. Thereafter, the coupon information having the granted discounts are wirelessly transmitted from the terminal to the point of sale (POS) terminal so as to permit redemption of those coupon upon which discounts have been granted. Such features are clearly not taught or suggested Mankoff.

Even further still, Mankoff fails to teach or suggest validating in the another terminal the transferred coupon information if the coupon information corresponds to any of the goods and/or services involved in the transaction, and if the coupon information is validated, calculating the discount provided by the coupon information to the purchase of goods and/or services as recited in the claims. Here again, these steps are concerned with the redemption process of the coupon information and as such are clearly not taught or suggested by Mankoff. At no point is there any teaching or suggestion in Mankoff of the steps performed during redemption of the virtual coupon.

The above noted deficiencies of Mankoff are not supplied by any of the other references of record particularly Granger and Souissi. Therefore, combining the

teachings of Mankoff with one or more of Granger and Souissi still fails to teach or suggest the features of the present invention as now more clearly recited in the claims.

Granger teaches an in-vehicle promotion system for automatically distributing promotions information to a vehicle when the vehicle comes within proximity of a retail outlet. The system taught by Granger is a "push" system. However, in Granger, similar to Mankoff, there is no teaching or suggestion regarding the wireless redemption of the coupons. Granger simply teaches that the coupons are redeemed by printing the coupons on paper and presenting the paper coupons to the store when the store during a transaction of the goods to be purchased. Thus, Granger suffers from the same deficiencies relative to the features of the present invention regarding the specific steps for the redemption of coupons as Mankoff.

Even beyond the above, Granger cannot be combined with Mankoff in the manner suggested by the Examiner since they are systems which operate completely opposite to each other. A "push" system is completely opposite to a "pull" system and such systems cannot be easily combined. Further, one skilled in the art having a "pull" system would not look to a "push" system to solve problems inherent in the pull system.

Therefore, combining the teachings of Mankoff and Granger in the manner suggested by the Examiner still fails to teach or suggest the features the present invention as now more clearly recited in the claims.

Souissi suffers from the same deficiencies as Granger and Mankoff relative to the features of the present invention as recited in the claims. Particularly, Souissi

does not teach or suggest any information regarding the steps which are performed so as to wirelessly redeem a coupon as in the present invention. Therefore, combining the teachings of Mankoff and Souissi in the manner suggested by the Examiner still fails to teach or suggest the features of the present invention as now more clearly recited in the claims.

Therefore, based on the above, Applicants submit that the features of the present invention as now more clearly recited in the claims are not taught or suggested by Mankoff whether taken individually or in combination with one or more of Granger and Souissi. Accordingly, reconsideration and withdrawal of the above described rejections of the claims under 35 USC §103(a) as being unpatentable over Mankoff in view of Granger and as being unpatentable over Mankoff in view of Souissi are respectfully requested.

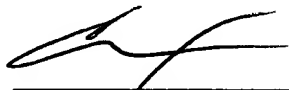
The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references utilized in the rejection of claims 1-4, 6, 8, 10, 11, 13, 15, 17, 19-21, 24, 26, 28, 29, 31, 33, 35, 37-39, 41 and 42.

In view of the foregoing amendments and remarks, Applicants submit that the present application based on claims 1-4, 6, 8, 10, 11, 13, 15, 17, 19-21, 24, 26, 28, 29, 31, 33, 35, 37-39, 41 and 42 are in condition for allowance. Accordingly, early allowance of claims 1-4, 6, 8, 10, 11, 13, 15, 17, 19-21, 24, 26, 28, 29, 31, 33, 35, 37-39, 41 and 42 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of Antonelli, Terry, Stout & Kraus, LLP, Deposit Account No. 01-2135 (0171.37906X00).

Respectfully submitted,

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